

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARIBEL BAEZ; FELIPA CRUZ; R.D., ON  
BEHALF OF HER MINOR CHILD, A.S.; on  
their own behalf and on behalf of all others  
similarly situated; UPPER MANHATTAN  
TOGETHER, INC.; and SOUTH BRONX  
CHURCHES SPONSORING COMMITTEE,  
INC.,

Plaintiff,

v.

NEW YORK HOUSING AUTHORITY,

Defendant.

No. 13 Civ. 8916 (WHP)

**DECLARATION OF ZACHARY W. CHALETT  
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN ORDER APPROVING  
MODIFIED AMENDED STIPULATION AND ORDER OF SETTLEMENT**

I, Zachary W. Chalett, declare under penalty of perjury that the following is true and correct:

1. I am an attorney with the law firm Proskauer Rose LLP, pro bono co-counsel for Plaintiffs Maribel Baez, Felipa Cruz, and R.D., on behalf her minor child, A.S., on their own behalf and on behalf of all others similarly situated; and for Upper Manhattan Together, Inc., and South Bronx Churches Sponsoring Committee, Inc. ("Plaintiffs"), in this action against the New York City Housing Authority. I am admitted to practice in this Court, and I respectfully submit this declaration in support of Plaintiffs' Motion for an Order Approving Modified Amended Stipulation and Order of Settlement, filed August 31, 2018.

2. As a courtesy to the Court, a true and correct copy of the unpublished consent decree entered in *United States v. Metropolitan Opera*, 11 Civ. 0236 (GBD) (S.D.N.Y. Jan. 12, 2011, ECF No. 2) is attached as **Exhibit 1**.

New York, New York  
August 31, 2018

/s/ Zachary W. Chalett  
Zachary W. Chalett